

November 29, 2018

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: Ex Parte Communication: WC Docket Nos. 10-90, 14-58, 07-135, and CC Docket 01-92

Dear Ms. Dortch:

On November 27, 2018, Genny Morelli and the undersigned of ITTA met separately with Preston Wise of the Office of Chairman Pai and Jamie Susskind of the Office of Commissioner Carr regarding the draft Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration in the above-referenced proceedings.¹

During the meetings, we expressed support for the draft's provisions related to increased funding for A-CAM carriers and attendant commitments to buildout at additional locations at speeds of 25/3 Mbps; ensuring sufficient and predictable support for legacy rate-of-return carriers; a new model offer for legacy carriers; and separate budgets for the model-based and legacy programs. We also reiterated that the draft's provisions for funding the A-CAM programs and legacy mechanisms would have a de minimis impact on consumers' bills.²

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/

Michael J. Jacobs Vice President, Regulatory Affairs

cc: Preston Wise, Jamie Susskind

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¹ Connect America Fund et al., Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration, FCC-CIRC1812-02 (Public Draft Nov. 21, 2018).

² See, e.g., Letter from Michael J., Jacobs, Vice President, Regulatory Affairs, ITTA, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10-90, 14-58, and 07-135, CC Docket No. 01-92, at 1 (Oct. 26, 2018); Comments of ITTA – The Voice of America's Broadband Providers, WC Docket Nos. 10-90, 14-58, and 07-135, CC Docket No. 01-92, at 13-14, 17-18 (May 25, 2018).